

EXHIBIT A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.¹

X

:

:

:

: PROMESA

: Title III

:

: Case No. 17-BK-3283 (LTS)

:

: (Jointly Administered)

:

:

X

**ORDER GRANTING MOTION OF OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR ENTRY OF ORDER, UNDER BANKRUPTCY RULE 2004,
AUTHORIZING DISCOVERY PROGRAM WITH RESPECT TO CERTAIN CAUSES
OF PUERTO RICO FINANCIAL CRISIS**

Upon consideration of the *Motion of Official Committee of Unsecured Creditors for Entry of Order, Under Bankruptcy Rule 2004, Authorizing Discovery Program With Respect to Certain Causes of Puerto Rico Financial Crisis* (the “Motion”),² and the exhibits attached thereto, the Court hereby FINDS AND DETERMINES that (i) the Court has jurisdiction to consider the Motion and the relief requested therein pursuant to PROMESA section 310; (ii) venue is proper before this Court pursuant to PROMESA section 307(a); (iii) due and proper notice of this Motion has been provided under the particular circumstances and no other or further notice need be provided; (iv) based on the statements and arguments made in the Motion,

¹ The Debtors in these title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474).

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.

the Court finds that examination under Rule 2004 of the Federal Rules of Bankruptcy Procedure is appropriate, including but not limited to examination of the documents sought in the Document Requests identified as Exhibits B to H of the Motion (the “Document Requests”).

Accordingly, it is hereby ORDERED THAT:

1. The Committee is authorized to commence an investigation concerning the issuance, sale, and creation of Commonwealth Debt (the “Discovery Program”).
2. The Committee is authorized to issue the Document Requests attached as Exhibits B to H to the Motion.
3. The Committee and recipients of the Document Requests are directed to meet-and-confer concerning the scope and timing of production in response to the Document Requests. This Order does not address any objections as to discovery scope and timing, all of which are reserved.
4. Any discovery disputes that may arise in the course of the Discovery Program are referred to Magistrate Judge Dein.
5. The terms of and conditions of this Order shall be immediately effective and enforceable upon its entry.

Dated: August ____, 2017

HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE